

The Honorable Benjamin H. Settle

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

October 4th 20 23
By Ravi Subramanian, Clerk
[Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff

v.

STEVEN L. VERES,
Defendant.

NO. CR23-5207 **BHS**

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

(Influencing Federal Official by Threat)

On or about February 16, 2023, in Thurston County, within the Western District of Washington, STEVEN L. VERES did threaten to assault and murder Victim 1, an employee of the United States and of any agency in any branch of the United States Government, with intent to impede, intimidate, and interfere with Victim 1 while he was engaged in the performance of his official duties.

1 The Grand Jury further alleges that STEVEN L. VERES did intentionally select
2 Victim 1 as the object of the offense of conviction because of the actual or perceived
3 race, color, national origin, and ethnicity of Victim 1.

4 All in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 1114.

5 **COUNT 2**

6 **(Interference with Federally Protected Activities)**

7 On or about February 16, 2023, in Thurston County, within the Western District of
8 Washington, STEVEN L. VERES did, by force and threat of force, willfully intimidate
9 and interfere with, and attempt to willfully intimidate and interfere with, Victim 1,
10 because of Victim 1's race and color, and because Victim 1 was and had been, and in
11 order to intimidate Victim 1 and any other person from, participating, without
12 discrimination on account of race and color, in federally protected activity described in
13 18 U.S.C. § 245(b)(1)(C), to wit, enjoying employment, or any perquisite thereof, by any
14 agency of the United States.

15 All in violation of Title 18, United States Code, Sections 245(b)(4).

16 **FORFEITURE ALLEGATION**

17 The allegations contained in Count 1 of this Indictment are hereby realleged and
18 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
19 offense alleged in Couns 1, STEVEN L. VERES shall forfeit to the United States,
20 pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28,
21 United States Code, Section 2461(c), any property that constitutes or is traceable to
22 proceeds of the offense.

23 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
24 any act or omission of the defendant,

25 a. cannot be located upon the exercise of due diligence;
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- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL: *Yes*

DATED: *October 4, 2023*

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON


TESSA M. GORMAN
Acting United States Attorney


AMY JAQUETTE
Assistant United States Attorney


JOCELYN COONEY
Assistant United States Attorney


WILLIAM DREHER
Assistant United States Attorney